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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
DISCOVERY FOR JANUARY 16, 2025
DISCOVERY MANAGEMENT
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the January 16, 2025, Discovery Management Conference (“DMC”).

I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action

A. Court-Ordered Update re: *The People of the State of California v. TikTok Inc., et al.*

1. Joint Status Update:

The Court’s DMO dated November 26, 2024 ordered the parties in the action *People of the State of California v. TikTok Inc., et al.*, case no. 5:24-cv-7942 “to provide a brief status update and contingent discovery plan.” Counsel met and conferred on December 20, 2024 and January 7, 2025 regarding discovery and the ordered update.

The Court is scheduled to hear the People’s pending motion to remand and for just costs and actual expenses on February 12, 2025. Discovery has not been served by any party, and the parties expect to meet and confer further regarding Rule 26 initial disclosures. TikTok intends to file a motion to dismiss, but its deadline to do so is stayed. *See* Nov. 21, 2024 CMC, Tr. 18:2-8.

2. Contingent Discovery Plan:

The People’s Position: The People’s case against the TikTok defendants, two of whom are new parties to the MDL, requires a substantial amount of initial written discovery in advance of fact depositions and cannot possibly proceed on the same schedule presently in the MDL. As background, TikTok’s productions during the multistate investigation that led to the People’s action being filed on October 8, 2024 were far from complete, and in fact TikTok is presently subject to a motion for sanctions for spoliation of documents during the investigation as well as to compel long outstanding productions. *See* Motion Requesting Remedies to Address Spoliation and Compel Compliance with Agreed Order, *In re Investigation of TikTok, Inc.*, Chancery Court of Davidson County, Tennessee, Case No. 23-0298-I [<https://www.tn.gov/content/dam/tn/attorneygeneral/documents/pr/2024/pr24-71-motion.pdf>].

Accordingly, while the People fully expect that Judge Gonzalez Rodgers will promptly remand the case back to state court, should remand be denied the People will continue to confer with TikTok and raise

1 with the Court determination of the appropriate case management schedule (i.e. separate track). Presently,
2 the People anticipate proposing a trial date in late 2026 or early 2027, and corresponding discovery
3 deadlines in 2026.

4 Recently, TikTok informally raised with the People two positions that would limit the People's
5 discovery rights. These issues are the subject of ongoing meet and confer and are not ripe disputes. First,
6 TikTok has demanded that the People (but not TikTok) be subject to the existing fact discovery cutoff in
7 the MDL (April 4) and be required to immediately cross-notice depositions of witnesses the PI/SD
8 plaintiffs are deposing. The People have received no notice of those depositions and continue to lack
9 access to the discovery TikTok has produced to the PI/SD plaintiffs. Imposing such a limitation is highly
10 prejudicial, inequitable and unreasonable. TikTok's intended motion to dismiss would not even be heard
11 by the April 4 fact discovery cutoff. If this case were to stay in federal court, which it will not, the People
12 are of course willing and open to confer and agree to reasonable limitations on discovery to prevent
13 unnecessary duplication. To that end, the People propose that the parties confer on the issue and, should
14 Judge Gonzalez Rodgers deny the remand motion, update the Court at the then next discovery
15 management conference. Second, TikTok has demanded that any discovery materials from the MDL it
16 provides to the People now (before the remand motion is decided and despite this Circuit's strong
17 presumption against removal jurisdiction) be subject to the terms of the federal MDL's protective order
18 even after the case is remanded to state court. The federal protective order is unworkable for application
19 to a discrete tranche of documents before the case is remanded, and doing so would be highly inefficient.
20 The People proposed alternative means to protect confidential materials without complicating discovery
21 in state court, and we will continue to confer with TikTok on this issue.

22 **The TikTok Defendants' Position:** This case overlaps substantially with cases in the MDL,
23 and—subject to certain exceptions for discovery to be taken by Defendants—should follow the MDL's
24 existing discovery schedule. Plaintiff should be required to accept the existing MDL production and to
25 participate in planned depositions. The operative Protective Order, ESI Protocol, and Deposition Protocol
26 all apply to discovery in this action as a “later-transferred” action. *See* Protective Order Section 2.1; ESI
27 Protocol Section 1; Deposition Protocol Order at 1. Plaintiff has questioned whether the Section 7.1 of the
28 operative protective order requires revision to apply to this action, but that issue can be addressed

separately, and does not require wholesale renegotiation of the operative orders and protocols. Indeed, Plaintiff is already bound by this same protective order in its case against Meta. Accordingly, Defendants have proposed providing Plaintiff with the documents they have produced to date in the MDL, subject to agreement or a ruling that the MDL protective order applies to this action.

To the extent Plaintiff, which enters this litigation with the benefit of having received substantial discovery from Defendants during a lengthy pre-suit investigation, argues it cannot complete discovery from Defendants within the existing deadlines, any exceptions to those deadlines should be limited and allowed only on a showing of good cause. Plaintiff's position that it should not participate in discovery now will create significant inefficiency; in effect, Plaintiff argues that the same witnesses currently being scheduled for deposition should be presented again at a later time for Plaintiff's case alone. That kind of inefficiency is contrary to the purpose of the MDL and would give Plaintiff an unjust "second bite at the apple" for each deposition. As to discovery from Plaintiff, in order for Defendants to have sufficient time to take necessary discovery, the Court should grant a modest extension of three months to the existing fact discovery deadline, limited to allowing discovery of Plaintiff and any relevant third parties by Defendants.

Finally, Plaintiff raises a pending motion filed in Tennessee relating to investigation documents. While that issue is not relevant to the commencement and schedule of discovery in this case, TikTok disputes Tennessee's allegations and will be filing a forthcoming opposition to the referenced motion.

II. Administrative Issues that Are Disputed or Require Court Action

There are no disputed administrative issues (requiring Court action) that the Parties would like to bring to the Court's attention.

III. Ripe Disputes for Which Joint Letter-Briefs ("JLBs") Have Already Been Filed or Will Be Filed Imminently

A. Meta v. State AGs

1. Meta's Administrative Motion for Leave to File Motion for Discovery Sanctions Before Magistrate Judge Kang and to Set Briefing Schedule (ECF 1471, 1481)

2. Outstanding state agency discovery disputes (Joint Letter Briefing filed December 20, 2024 [ECF 1482]; Status Reports filed January 6, 2025 [ECF 1503])
3. 30(b)(6) depositions of States/agencies (Joint Letter Briefing to be filed January 13, 2025 (Court deadline))

B. Snap v. PI/SD Plaintiffs

1. Production of messages from current and former employees' Snapchat accounts
2. Timeline for production of Quips
3. Snap's assertion of privilege over communications involving investigations

C. YouTube v. PI/SD Plaintiffs

1. Non-Custodial Sources [ECF 1436]
2. RFP Set 3, Nos. 37, 50

D. Defendants v. PI Bellwether Plaintiffs

1. Plaintiffs' use of declarations or affidavits by non-deposed treaters in connection with summary judgment or Rule 702 briefing (Joint Letter Brief to be filed January 13, 2025)
2. Number of non-treater fact witnesses (e.g., family members, friends, and other non-parties) Defendants seek to depose (Joint Letter Brief to be filed January 13, 2025)
3. Parent/witness attendance at depositions (Joint Letter Brief to be filed January 16, 2025)

IV. Unripe Disputes

A. Defendants v. PI Bellwether Plaintiffs

1. Defendants' productions of structured data responsive to PI Bellwether-specific RFPs

2. RFPs held in abeyance by JCCP plaintiffs

B. Defendants v. SD Bellwether Plaintiffs

1. Pace of SD Bellwether Plaintiff document productions
2. Defendants' request to expand 35-hour SD Bellwether Plaintiff deposition cap
3. SD Bellwether Plaintiff preservation/collection and litigation hold issues
4. District-specific RFPs

C. Meta and Snap Defendants v. Plaintiffs

1. Stipulated Source Code Protective Order

D. Meta v. Plaintiffs

1. Meta's written interrogatory responses from Meta Related Actions
2. Length of depositions of certain Meta executives
3. Whether Plaintiffs' pending interrogatories exceed the Court's limits
4. Meta's privilege log
5. Dispute between SD Plaintiffs and Meta concerning RFP No. 3 from Set A
6. Meta's responses to Interrogatory No. 1 and Plaintiffs' Second, Third, Fourth, and Fifth Set of Interrogatories
7. Meta's responses to Plaintiff's First Set of Requests for Admission
8. Dispute between PI/SD Plaintiffs and Meta related to production of privilege logs and document redactions

E. Meta v. State AGs

1. State AGs' responses and objections to Meta's First Set of Interrogatories
2. State AGs' responses and objections to Meta's Second Set of Interrogatories
3. State AGs' responses and objections to Meta's Third Set of Requests for Production of Documents
4. Limits on Meta's depositions of State AGs and state agencies
5. Meta's response to AG RFPs (64, 67, 99, 102, 112, 151-153, 159, 160, 161, 162-163, 164, 166-169, 174, 175)

F. Snap v. PI/SD Plaintiffs

1. Snap's identification of a date for Rule 30(b)(6) deposition regarding age verification and age inference
2. Production of hyperlink requests
3. Production of responsive information from the following non-custodial sources: Coda, Confluence/Snappy, Looker, Google Groups, and SnapMap

G. TikTok v. PI/SD Plaintiffs

1. SD RFP Set A
2. Preservation/collection and litigation hold issues
3. TikTok Defendants' substantial completion of its document productions
4. TikTok Defendants' objections to Plaintiffs' Third Set of Requests for Admission
5. TikTok Defendants' production of user complaint / feedback data prior to December 2021
6. TikTok Defendants' production of the High Risk Standard Operating Procedures requested at a deposition on December 18

H. YouTube v. PI/SD Plaintiffs

1. Dispute between PI/SD Plaintiffs and YouTube related to production of privilege logs
2. YouTube's Responses and Objections to Plaintiffs' Interrogatory Set 2
3. RFP Set 5, Nos. 81-87
4. RFP Set 6, Nos. 103-109

1 Respectfully submitted,

2 DATED: January 10, 2025

By: /s/ DRAFT

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ATTESTATION

I, Abigail Burman, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 10, 2025

By: /s/ Abigail Burman